

H(cont) normal stages as described on page 3-202, and therefore the tunnel filling constitutes no hazard to boating. The river is shown not to fill the tunnel during peak boating months, June through September. River-borne debris can be a hazard in any reach of the river but does not require the reach be closed. Boating is nowhere limited to daylight hours, and night-time boating occurs in this reach in summer. Curiously, the EIR states that boating, fishing and swimming are known to occur in the area, but no incidents or accidents with the tunnel are noted. Claims of hazardous conditions are unjustified.

J **Boating Miles.** Action alternatives will not significantly increase the number of river miles (2-88) available for boating. Current conditions allow rafting during the seasons when rafting is popular, with the only possible closures during flood flows in the tunnel before the river overflows into its natural channel. Boaters are well aware of these readily visible conditions and have not had problems with the tunnel.

K **Lake and River Levels.** Decreases in flows of the Lower American River and lower levels in Folsom Lake would create significant impacts to water-based recreation in the region. Both the river and lake resources serve vast numbers of visitors who depend on water levels for suitability of recreation activities.

L **Recreation Plans.** Recreation development plans should be included in this EIR as necessary and proposed part of the project. The vehicle access route will be shared with maintenance vehicles, resulting in conflicts. Alternative roads in the area including Highway 49 are not developed or maintained to standards for existing uses in ASRA.

N **Parking at River Access.** Problems with 20-car parking lot at river end of gravel road include congestion, dust, noise, spinouts due to steepness, inadequate space to pass on narrow road, and lack of shade for parking. Parking should be provided for 200 cars based on usage at the confluence and Upper Clementine. The proposed river access site would likely receive even more demand for recreation due to its proximity to urban development and location within the city limits of Auburn. As stated on page 3-212, the Confluence typically "...does not have sufficient parking to accommodate users." In addition, there is an apparent inconsistency with the statement on 2-81 that 70 vehicles at one time would be accommodated at the access parking.

P **Slopes.** Slopes for the tunnel closures should be reduced from 2:1 to at most 3:1 to allow maximum revegetation and improve slope stability and aesthetics. Revegetation of disturbed areas should be included in the plan and EIS/EIR.

R **Closures.** Closure of the large project area over the period from 2002 to 2004 is a highly significant impact on recreation for the proposed project. (2-35 and 3-211) In addition, the closures will likely result in additional environmental impacts from overcrowding due to artificial concentrations of visitation at the confluence area. These impacts should be addressed in detail. Any closures should be strictly limited to the immediate area of active construction and associated hazards. Many management alternatives are available to preclude the necessity of total closure for recreation use. The acreage of the closure should be stated in the EIS/EIR. The reference to Order #318-02-91 should reflect more

J. Boating activities below the Middle Fork/North Fork American River confluence are limited; CDPR's posted order (No. 318-02-91) prohibits boating ½ mile above and ½ mile below the Auburn Dam construction site. Further, until recently, CDPR had a posted sign noting no boating beyond the Highway 49 Bridge at the North Fork/Middle Fork American River confluence due to limited availability of suitable boating take-out locations between the confluence and Auburn Dam site. Therefore, implementation of the Proposed Project including rewatering of the North Fork American River near Auburn and official opening of the stretch of river from the Middle Fork/North Fork confluence through the project site and to Folsom Reservoir would substantially increase the total number of boatable miles for public recreationists. It is recognized that the boating miles for commercial rafting would not increase as CDPR would not issue commercial boating permits as part of this project.

Please also refer to Response L-5.E.

K. The American River Pump Station Project Draft EIS/EIR evaluates the potential for the Proposed Project and alternatives to impact lower American River and Folsom Reservoir recreation activities (3.8, Recreation, Section 3.8.2.3, Impact Analysis) and describes the degree of such impacts, including cumulative conditions, using established thresholds and significance criteria.

L. It is unclear what is meant by "recreation development plans." The Proposed Project includes public river access features to mitigate for anticipated increased North Fork American River use in the project area. These features are proposed to be consistent with the goals and design considerations of the Auburn State Recreation Area (SRA) Interim Resources Management Plan (1992), and would fall under the management responsibility of CDPR through it's contractual arrangement with Reclamation. Reclamation and CDPR are responsible for providing long-range planning for the Auburn SRA including preparation of a comprehensive study public participation, and environmental review. Reclamation recently appropriated funding for the update to the Auburn SRA IRMP. Initial study efforts are expected to be underway in 2002.

M. Please refer to Master Response 3.1.6, Public River Access Features. It is noted that project area roadway design considerations include anticipated multiple users and incorporate means of reducing user conflicts through provision of separate parallel trails where needed and permitted use signage.

Letter 5, page 3 responses continued.

Response N

In response to public comments received on the Draft EIS/EIR, the lead agencies and CDPR have modified the proposed public river access parking lot design. The 20-car river-side parking area has been redesigned. A vehicle turnaround area and three handicap accessible (including one sized for vans) would be created instead. This change minimizes potential congestion, noise, and dust concerns. The access road would be designed to adequately accommodate these uses. These changes are described in the Final EIS/EIR, Chapter 3.0, Section 3.15.2.4, Impact Analysis, Operation. These modifications do not alter the conclusions presented in the Draft EIS/EIR. Please refer to Master Response 3.1.6, Public River Access Features.

Response O

The preliminary parking lot design described and evaluated in the Draft EIS/EIR (page 2-81) included two separate parking areas with space for up to 70 vehicles. As described on page 2-26 in Section 2.2.2.1, the preliminary proposal included a 20-space lot adjacent to the river, and a 50-space lot in the flat area above Oregon Bar (former Auburn Dam concrete batch plant site).

Response P

The final design of the tunnel closure features remains under development. These efforts include consideration of slope stability and project area aesthetics as they relate to the overall project river restoration design objectives. Please also refer to Master Response 3.1.5, Project Area River Restoration and Response L-5.Q.

Response Q

Vegetation is expected to grow on the slopes and benches over time, much as has already occurred in the existing disturbed reach. Reclamation would be responsible for the long-term monitoring of natural vegetation growth in the project area and would evaluate the need and appropriateness of strategic native vegetation planting should natural growth appear inadequate. Please refer to Master Response 3.1.5, Project Area River Restoration.

Response R

Please refer to Master Response 3.1.3, Recreation Trail Access During Construction. Reclamation and CDPR recognize existing concerns regarding recreation use at the confluence and will address these issues in their long-term comprehensive planning studies for the Auburn SRA later this year.

R (cont)	<p>recent orders amending it. The original order is excessively broad in geographical areas closed in that it includes the entire drainages of Kickerbocker and Salt Creeks and other lands unrelated to the project site. If these lands are to remain closed, they must be considered as part of the project area for EIS/EIR evaluations.</p>
	<p>Temporary closure for construction must also be considered a significant impact, since the time frame extends substantially more than a year. For mountain bikers, there is no reasonable alternative route. Additional use of Highway 49 as an alternate trail during construction would impact traffic and existing use on Highway 49 where congestion is already an impact.</p>
S	<p>The statement that continued operation of the pumping plant would prevent closure of the tunnel requires further clarification. The current pumping site is above the tunnel. Access roads have been constructed throughout this area in the past and could be reactivated for seasonal installation. Such construction would be less costly and have less impact on the environment than would the tunnel closure proposed in the action alternative. The statement seems to confuse the action and no action alternatives (2-112)</p>
T	<p>Bridge Alternative. Page 2-35 stated permanent closure of the Auburn-Cool Trail would be a significant impact with no proposed alternative or mitigation. For this significant impact, a bridge should be installed to compensate for loss of access. Such a bridge could readily be designed into the channel alteration plans and placed outside of future construction project sites. A bridge should be incorporated into the channel design to preclude future costs. The bridge may be of a temporary, removable design. For example, it could be installed during June through October periods when flows of record are below 10,000 cfs. Incorporating abutments into the artificial channel banks would incur no additional cost for the proposed project. Bridge span (and costs) can be minimized by design of a narrow and deep channel reach for the bridge to clear the river surface. In addition, for periods when bridge access is not available at the project site, the No-Hands Bridge should be opened to bicycle use, and a new trail extended to accommodate bicycles to the Auburn-to-Cool Trail on the south side of the river below No-Hands Bridge. Without bridge access across the river, significant safety impacts will be incurred with the preferred project as hikers, bikers and horse riders attempt to cross the river on the trail in a variety of stream conditions.</p> <p>Highway 49 is already beyond capacity and a substandard mountain road, according to Caltrans, and therefore unsafe for bikers to use as an alternative to the Auburn-Cool Trail as stated on page 3-212. After project, the river will be a barrier to users on the trail. Accordingly, the proposed temporary closure and permanent blocking of this trail and the project action will constitute a significant impact to bike recreation in the area. A new bridge at the site would be the only way to provide mitigation and must be considered part of the project proposal.</p>
U	<p>Hazard Consistency. The draft (2-86) states that existing use of the tunnel area under its closed status is a hazard, yet construction activity including explosives is not a hazard under closed status. This inconsistency among premises is unacceptable in the EIR.</p>

- S. The lead agencies could not pursue closure of the bypass tunnel and return of river flows to the river channel under the No Action/No Project Alternative. These modifications to the project area would require relocation of the seasonal pump station facilities and would be more extensive than what is permitted under existing conditions or what would occur under the No Action/No Project Alternative. Please also refer to Response L-5.Y.
- T. Please refer to Master Response 3.1.1, Auburn to Cool Trail.
- U. Construction blasting is considered a public safety hazard and would be confined to relatively small areas. The public would not be allowed into any areas where preparations for blasting or blasting operations were taking place. Reclamation's construction contractor would manage the area to control and minimize potential safety hazards within the specific area where blasting operations would be performed. The tunnel and access to it cannot be reasonably controlled; therefore, it remains a hazard. Please also refer to Master Response 3.1.4, Auburn Dam Construction Bypass Tunnel.

U (cont)	Moreover, a clear alternative exists in opening the area to use and designing facilities to provide for public safety there, as has been done on other recreation sites on rivers in the region. This would reduce the impacts to less than significant for the No Project alternative, and such mitigation or avoidance opportunities must be included in the EIR. Upstream on the Middle Fork, all boaters pass safely through a tunnel below Tunnel Chute. Flood circumstances could also cause seasonal inundation of the tunnel with no outlet, but that is not considered a safety issue, and all boating use is permitted there.
V	Project Area. The project area should be amended to include the river within the Folsom Lake bed since the lake is seldom full, and the river remains a valuable resource. Impacts to recreation and terrestrial values must be considered downstream from Oregon Bar (3-51) at least to the vicinity of Rattlesnake Bar. This reach has riparian as well as littoral values. The draft states that the action proposed could reduce the level of Folsom Lake further than current conditions. If the additional drawdown if 10 feet, for example, then the project action would impact an additional half mile of river below the tunnel site, based on a gradient of 20 feet per mile.
W	Backwater Effects. Diversion backwater effects are not clear (3-211). Is this a temporary diversion structure or the proposed project? To what height will waters be raised over no-project conditions? During what flow events will the backwater occur? How long will the diversions occur? By what criteria would the backwaters be insignificant? This appears to be a significant adverse affect to the river environment.
X	Rapid Design or Concept. The nature of rapids to be designed into the proposed new river channel should be described in detail. How will they be rated in comparison to the relatively flat water of the existing tunnel and adjacent river reaches? How will they serve current or new recreation needs in the area? (3-212)
Y	Alternative 4. Another alternative should be included in the EIS/EIR which directly addresses the key legal issue of restoring the river to its natural channel. That Alternative 4 would provide for tunnel closure without change in pumping status, similar to the alternative that provides for a permanent pump station without tunnel closure.
Z	Water Use Impacts. Impacts for new development in Western Placer County should be addressed more fully in the EIS/EIR, not just the programmatic documents. What uses will be made of the additional water in terms of crops or pastures irrigated, or ranchettes served (2-45)? How does the project water compare in cost and quality to groundwater pumping or other sources in that region? Will additional water change the land uses, and if so, how? Will changing uses of the water affect uses of the river above the project site for recreation (Section 3-7)? The EIS/EIR currently does not provide sufficient information for decisionmakers and the public in this regard. There is an apparent inconsistency with the indications of water use for urban growth on page 3-6 and 3-40, and those impacts should be described in greater detail in this EIS/EIR regardless of the authority of PCWA over land uses. Further, the EIS/EIR should note that groundwater drafting is uncontrolled and overdraft conditions could result regardless of project actions.
AA	
BB	

- V. The regional and project area settings considered in the Draft EIS/EIR impact evaluations are described in Chapter 3, Section 3.2.1, Regional Setting and 3.2.2, Project Area Setting (pages 3-5 and 3-6) and shown on Figures 2-1, Regional Setting (page 2-2) and 2-2, Project Area Setting (page 2-3). The potential effects of reduced Folsom Reservoir elevations includes the reservoir up to its high water line, upstream of Oregon Bar (Figure 2-2). The potential effects of the Proposed Project and alternatives upon terrestrial recreation and other resources due to fluctuations in Folsom Reservoir elevations are presented in the diversion-related analyses in Chapter 3.
- W. Please refer to Master Response 3.1.7, Tamaroo Bar.
- X. The Proposed Project would have two channels that provide boat passage. The main (river right) channel would contain the water diversion intakes. These intakes would be integrated into boat chutes whose geometry creates favorable hydraulics for recreational boating, such as standing wave and mild hydraulic jumps. The geometry of the chutes was developed specifically for recreation and has been employed successfully at several sites, notably the Horseshoe Bend Hydroelectric project. The overall difficulty of the rapids through the diversion would be Class II, and Class III on the international scale, depending on the water level. At lower flows, difficulty would be Class II and at higher flows, difficulty would increase to Class III. This level of difficulty is comparable to the first rapid that occurs in the river just below the project site, downstream of the bypass tunnel outlet and upstream of Oregon Bar. The primary water intakes would be located on the invert of the boat chutes. These intakes would be appropriately screened to prevent trapping boaters; the intake screening also would meet CDFG fish screening criteria. A third boat chute would be constructed below grade, downstream of the two other boat chutes. Construction of this structure anticipates the lowering of the riverbed with time and would provide a variable transition for the diversion structure to the downstream riverbed.

At higher river stages (greater than 2,000 cfs) whitewater craft would be able to pass through a bypass channel on the river left (east) side. The total drop of the secondary channel would be roughly 8 feet over a distance of approximately 400 feet. This would produce a bottom gradient of little more than two percent. The bypass channel would be separated by a berm (a rock divider), which would be overtopped during high water (about 4,000 cfs), thereby joining the two channels. The river left (east) bank adjacent to the diversion would be graded at a slope of 5:1 (or less) for some distance above the anticipated high water level of 4,000 cfs. Boaters would be able to use this bank to scout the rapids and portage. Regarding present recreation needs, a report prepared by John Anderson for Montgomery Watson in 1997 addressed the recreation potential of the river. The report identified potential river uses, in detail, with reference to various stretches of the river. The stretch from the confluence to Robie Point would be appropriate for an easy family float trip. From the dam site to Oregon Bar, the whitewater is more challenging and more suitable for advanced beginning and intermediate whitewater boaters. Use from Oregon Bar to Rattlesnake Bar would depend on Folsom reservoir levels. During the high pool season, the trip to Rattlesnake Bar would be a long, flat water paddle.

Letter 5, page 5 responses continued.

Response Y

The alternative suggested by the commenter was not included as a separate alternative because it was not workable or feasible. In any event, consideration of these elements in relation to the project purpose, needs and objectives are addressed in Tables 2-1 and 2-2 of the alternatives, although each issue was evaluated separately. Health and safety factors associated with the tunnel closure were considered under the No Action/No project Alternative. Additionally, the seasonal pumps that are currently used to withdraw water in this section of the American River could not function if the river was re-watered and the tunnel closed because water levels at the point of diversion would be too low.

As discussed on page 2-5 of the Draft EIS/EIR, key features of the Proposed Project (Mid-Channel Diversion) include the intake/diversion location and the pump station site. The intake/diversion structures would remain situated on the outside curve of the natural channel to take advantage of the narrowed portion of the river channel created by the northwestern bank. The narrow channel formed by the cofferdam remnant creates a natural pooling of the river flow and permits control for the diversion. It would not be feasible to use the intake structures at the existing point of diversion that are associated with the seasonal pump station operations because, once the river is restored to its natural channel, flows will progress through the widened streambed and this will not provide adequate instream water depths to for the intake/diversion to function properly.

In order to adequately restore the river channel, approximately 700,000 cubic yards of cofferdam debris, alluvium and large rocks would be excavated from the dry river channel. Under the Proposed Project, this material along with an estimated 300,000 cubic yards of material generated from construction activity would be used to (a) build and reshape the river channel, (b) stabilize, fill and create barriers to the upstream and downstream tunnel openings, (c) fill holes in the keyway associated with past disturbance during the original construction of Auburn Dam as well as (d) provide building and fill material for the pump station facility.

Funding allocations for the river restoration efforts are tied to mitigation elements associated with the pump station expansion. There are currently no funding sources available to solely provide for an isolated river restoration project of this magnitude. It would not be economically feasible to remove such a vast quantity of material to a location far off-site, nor are there presently the financial means in place to do so. Therefore, this alternative was eliminated from further consideration because it did not meet the two primary criteria that would merit additional consideration and analysis which were: (a) meeting most of the project objectives; and (b) being technically, economically, and environmentally feasible.

Response Z

The impacts for land development within Placer County are appropriately addressed programmatically through the County's General Plan preparation and environmental review process and then by subsequent project-specific environmental evaluations and review by county or city planning departments and other permitting or regulatory agencies. PCWA has no land use approval or decision-making authority within the county, but recognizes the supply of water supports new development, as planned by the County and cities within its service area. As described in the Draft EIS/EIR, PCWA's delivery of raw water supplies to agricultural lands within western Placer County is not expected to change substantially from the existing condition. Also refer to Placer County Water Agency Surface Water Supply Update for Western Placer County (PCWA 2001) and Response L-21.A. As described in the Draft EIS/EIR, other sources of water and groundwater do not offer cost-efficient means for PCWA to obtain water supplies within the short-term, as compared to gaining reliable access to its existing permitted MFP water entitlement.

Response AA

The Draft EIS/EIR addresses the potential impacts upon river recreation above the project site (Chapter 3, Section 3.8, Recreation). Additional clarification is provided in Response L-5.E.

Response BB

Comment noted.

CC

List Costs Components. Costs should be listed for components of the major features of the alternatives in Table 2-2. For example, what is the cost for the recreation access improvements? Project cost estimates indicate that the proposed project will cost \$31 million, greater than the amount initially authorized for Auburn Dam. At that cost, the project costs equal 31 to 124 years of current operation costs. Similarly, the proposed project would cost about 60 to 240 times the existing cost per acre foot of water diverted. This contrast is impossible to justify on the value of additional water diversions. Although restoration is desirable, the proposed project would cost an excessive \$40 million per mile of channel artificially restored. We should just say, 'It is what it is' and work with the site to restore ecological functions.

DD

Include Oral Comments. Oral comments presented at scoping meetings must be included in the Summary of Public Concerns (1-11). Comments included that the area closures should be removed, safety of the tunnel was not a realistic problem, there was no history of incidents or accidents there, that several guidebooks referred to the reach below Highway 49 as Class II without substantial hazards or rapids, and that the tunnel itself was Class I as a half mile of flat water.

Until the above concerns are reflected in the EIS/EIR, I support the No Project alternative.

Thank you for your consideration.

Sincerely,



Emmett Cartier

CC. Breakdown for the major components of the Proposed Project are as follows:

Pump station/diversion facilities	\$18.1 million
Auburn Dam construction bypass tunnel	\$ 1.0 million
North Fork American River channel excavation & public river access features	\$11.9 million
Total	<u>\$31.0 million</u>

This information is included in the Final EIS/EIR, Chapter 2.0, Section 2.2.2, Proposed Project – Mid Channel Diversion Alternative. This change does not alter the conclusions presented in the Draft EIS/EIR. The original authorization for Auburn Dam was \$411,170,000 (House Document No. 171, 88th Congress, first session).

DD. The Draft EIS/EIR (Chapter 4.0, Section 4.2 Public Involvement) provides a summary of all public and agency scoping comments received at public scoping and informational meetings related to preparation of the Draft EIS/EIR. Please also refer to Master Response 3.1.4, Auburn Dam Construction Bypass Tunnel for information related to the tunnel hazard.

L-6



COMMENT CARD
PLACER COUNTY WATER AGENCY/U.S. BUREAU OF RECLAMATION

PCWA AMERICAN RIVER PUMP STATION AND RIVER RESTORATION PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT

NAME:	Joannye Countryman
ADDRESS:	8425 Wise Rd
CITY/STATE/ZIP:	Auburn CA 95603
BUSINESS AND/OR HOME PHONE/FAX:	(530) 885-9795
ORGANIZATION (IF APPLICABLE):	American River Ride
COMMENTS:	
<p>go ahead and reroute the water but there still needs to be a way for our horses to get over to the other side. So the answer is to this situation is to build a bridge for us to get to the other side!</p>	
<p>How do we get to maidu Road from cool side of River. ifes you get your water recreation but. What about Hiking mtn Biking + horses getting to cool. Have to have a bridge for all to get to to other side from Auburn to Cool.</p>	
<p>What are the parking lots for? What is the recreation? <u>Rafting only!</u></p>	

PLEASE USE THIS TO SUBMIT YOUR COMMENTS ABOUT THE DRAFT EIS/EIR. YOU CAN SEND ADDITIONAL COMMENTS TO:
 DRAFT EIS/EIR COMMENTS, SURFACE WATER RESOURCES, INC., 2031 HOWE AVENUE, SUITE 110, SACRAMENTO, CA 95825
 JUST FOLD THIS SELF-ADDRESSED SHEET INTO THIRDS, SEAL, STAMP, AND MAIL. THANK YOU.

☒ Please check here if you would like to be on the project mailing list.

A. Please refer to Master Response 3.1.1, Auburn-to-Cool Trail.

B. Please refer to Master Response 3.1.6, Public River Access Features.

Oct 11, 2001

RE: The Mid-Channel Diversion Alternative

To Whom It May Concern:

I am writing this letter to put fourth my vote for your preferred alternative, The Mid-Channel Diversion Alternative, which proposes to close the Auburn dam diversion tunnel and restore the American River at the Auburn Dam construction site to its natural channel, while at the same time providing the water agency with riverside pumping and diversion facilities to supply water to customers in Placer County.

A

I am also happy that this preferred alternative will restore BOATABLE CONDITIONS AND FLOWS to this now dry reach of river, and begins to set the stage to provide public access to the Confluence Parkway - the long closed reach of the American River from the confluence of the North and Middle Forks of the American River to Folsom Reservoir.

I am a resident of Garden Valley, Coloma and spend a great deal of my like Kayaking and enjoying the American River. I am totally against the Auburn Dam and want this alternative to be passed.

I will be at the meeting on the 11th, but also wanted to send you this letter.

Thank you for fighting for all of us.

Patti Boyer
P.O. Box 979
Lotus, CA 95651

Palucia A Boyer

PS: After attending the open meeting tonight, I cannot see how you could go forward with this project without constructing a bridge for the trail from Auburn to Cool. It is a must.

B

Patti Boyer

A. Project support noted.

B. Please refer to Master Response 3.1.1, Auburn-to-Cool Trail.

L-8

COUNTY OF EL DORADO
ENVIRONMENTAL MANAGEMENT DEPARTMENT

October 11, 2001

American River Pump Station Project
Draft EIS/EIR Comments
Surface Water Resources, Inc.
2031 Howe Avenue, Suite 110
Sacramento, CA 95825

Jon A. Morgan
Director

Environmental
Health Division

Air Pollution
Control District

Solid Waste &
Hazardous
Materials
Division

Vector Control
Division



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SUBJECT: AMERICAN RIVER PUMP STATION PROJECT DRAFT EIS/EIR

To Whom It May Concern:

The El Dorado County Air Pollution Control District (District) has been asked to express comments that identify our concerns regarding the **AMERICAN RIVER PUMP STATION PROJECT DRAFT EIS/EIR**.

El Dorado County violates the state and federal ambient air quality standard for the criteria pollutant ozone at the Western Slope area of the county. As of June 1, 1995, El Dorado County nonattainment area classification status for ozone has been reclassified from a "serious" to a "severe" ozone nonattainment area (40 CFR [Code of Federal Regulations] Part 81 CFR Update Service). Monitoring data from the California Air Resources Board have indicated the town of "Cool" to have the highest ozone concentration in the Sacramento Metro area. The county violates state ambient air quality standard for the criteria pollutant fine particulate matter (PM10) at both the Western Slope and South Lake Tahoe area of El Dorado County. The California Clean Air Act of 1988 requires the state's air pollution control program meet the state's ambient air quality standards. The efforts of the District are focused primarily on attainment of state and federal ambient air quality standards for criteria air pollutants.

The District has the following comments in regards to the **AMERICAN RIVER PUMP STATION PROJECT DRAFT EIS/EIR (EIS/EIR)**.

1. The American River Pump Station Project area lies partially within El Dorado County. The EIS/EIR indicates there will be a significant air quality impact from nitrogen oxides (NOx) emissions during the construction phase. Although, the EIS/EIR puts more emphasis on the impact to Placer County than to El Dorado County. Air emissions do not recognize County boundaries. The District would like the EIS/EIR to address the significant air quality impact on El Dorado County from NOx emissions during the construction phase in more detail.
2. As mentioned above the Cool monitoring site has some of the highest ozone concentrations in the region. The Cool monitoring site is located approximately two (2) miles from the project site. The EIS/EIR references a Auburn air monitoring site and a Rocklin air monitoring site, but doesn't reference the Cool air monitoring site. The District would like the EIS/EIR to reference the Cool air monitoring site.

www.co.el-dorado.ca.us/emd

A. The Draft EIS/EIR Air Quality impact analysis (Chapter 3, Section 3.15) focuses on the potential effects of construction and operation upon sensitive receptors within the project study area. A sensitive receptor distance of ½ mile is used, although both the Placer County and El Dorado County air pollution control districts suggest an approximate ¼-mile distance for identification of sensitive receptors for air pollutant emissions. The analysis of NO_x and other air pollutants described for Placer County applies to El Dorado County as well. The Draft EIS/EIR identifies several sensitive receptors within the ½-mile range within Placer County; however, none were identified within the El Dorado County portion of the study area. Therefore, the focus of the analysis is appropriately within Placer County. The Final EIS/EIR, Chapter 3.0, Section 3.15.2.1, Methodology, provides this additional information explaining the focus of the air quality analysis. This information does not alter the conclusions presented in the Draft EIS/EIR.

B. The commenter requests that the EIS/EIR include reference to the Cool air monitoring site in El Dorado County. Information summarizing ozone level data from the Cool monitoring station, for the period 1995 through 1999 has been added to the Air Quality setting, as identified in the Final EIS/EIR, Chapter 3.0, Section 3.15.1.2, Project Area Setting, Air Quality Monitoring. This change does not alter the conclusions presented in the Draft EIS/EIR.

American River Pump Station Project
Draft EIS/EIR Comments
October 10, 2001
Page 2


C

3. The EIS/EIR under Section 3.13 GEOLOGY AND SOILS states the project area contains chrysotile (asbestos). In addition, the project is in an area identified as more likely to contain asbestos on the Division of Mines and Geology map titled Areas More Likely to Contain Natural Occurrences of Asbestos in Western El Dorado County, California (Churchill, March 2000). The EIS/EIR doesn't indicate how the project will comply with El Dorado County Ordinance number 4548, The Naturally Occurring Asbestos And Dust Protection Ordinance (Ordinance #4548 is enclosed). The EIS/EIR doesn't indicate how the project will comply with the California Air Resources Board's (CARB) proposed Asbestos Air Toxics Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations. The District would like the EIS/EIR to address the potential airborne asbestos emissions by indicating how the project will comply with El Dorado County Ordinance number 4548, The Naturally Occurring Asbestos And Dust Protection Ordinance and the CARB proposed Asbestos Air Toxics Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations.

If you have any questions regarding these comments, please call our office at (530) 621-6662.

Respectfully,

Dennis Otani, Program Manager
Air Pollution Control District


Patrick Tedeschi, Senior Air Quality Specialist;
Air Pollution Control District

Enclosure

PT:pt

Pt/ceqa/americanriverpumpstationdraftEIR

C. The commenter requests that the EIS/EIR indicate the Proposed Project's compliance with El Dorado County Ordinance Number 4548, Naturally Occurring Asbestos and Dust Protection Ordinance and the California Air Resources Board's Asbestos Air Toxics Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations. The environmental protection measures included in the Draft EIS/EIR satisfy the requirements of El Dorado County Ordinance 4548. Additionally, measures recommended in the referenced CARB Air Toxics Control Measure would be implemented by the construction contractor if asbestos is found at the project site (see Mitigation Plan, Appendix D to the Final EIS/EIR). This information is included in the Final EIS/EIR, Chapter 3.0, Section 3.15, Air Quality. These changes do not alter the conclusions presented in the Draft EIS/EIR.

Note: This comment letter included a copy of El Dorado County Ordinance 4548, The Naturally Occurring Asbestos and Dust Protection Ordinance as an attachment. A copy of this attachment can be reviewed at PCWA or Reclamation offices.